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December 16, 2015

Via ECF and Email

Honorable Shira A. Scheindlin
United States District Court
Southern District of New York
500 Pearl Street, Room 1620
New York, New York 10007-1312

Re: *Royal Park Investments SA/NV v. HSBC Bank USA, N.A.*, No. 1:14-cv-08175-SAS

BlackRock Balanced Capital Portfolio (FI), et al. v. HSBC Bank USA, N.A., No. 1:14-cv-09366-SAS

Phoenix Light SF Limited, et al. v. HSBC Bank USA, N.A., No. 1: 14-cv-10101-SAS

National Credit Union Administration Board, et al. v. HSBC Bank USA, N.A., No. 1:15-cv-02144-SAS

Dear Judge Scheindlin:

On behalf of all parties in the above-referenced actions, we write to update the Court regarding discovery matters.

As the Court will recall, at the November 16, 2015 conference, the Court raised the issue of whether discovery disputes should be referred to a Magistrate Judge or a Special Discovery Master. Following the November 16 conference, the parties continued to meet and confer but have reached an impasse as to search terms and custodians. Due to the complexity and resource-intensive nature of these disputes, the parties wish to avoid further burdening the Court and respectfully submit that appointment of a Magistrate Judge or Special Discovery Master who will handle the parties' disputes concerning discovery is appropriate and necessary.

The parties will confer and make either joint or separate submissions with their recommendations for appointment of a Magistrate Judge or Special Discovery Master by December 21, 2015. If the Court would like to hear further from the parties, we are available to appear for a conference.

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We thank the Court for its attention to this matter.

Respectfully submitted,

/s/ Kevin M. Hodges

Kevin M. Hodges

cc: All counsel of record (via ECF)